

SHEARMAN & STERLING LLP
599 Lexington Avenue
New York, New York 10022
Telephone: (212) 848-4000
Facsimile: (646) 848-8190
Douglas P. Bartner
Fredric Sosnick

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x
:
:
In re: : **Chapter 11**
:
LEHMAN BROTHERS HOLDINGS INC., et al. : **Case No. 08 – 13555 (SCC)**
:
Debtors. : **(Jointly Administered)**
:
:
-----x

**SUPPLEMENTAL VERIFIED STATEMENT OF SHEARMAN & STERLING LLP
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Shearman & Sterling LLP (“Shearman & Sterling”), a law firm maintaining its offices at 599 Lexington Avenue, New York, New York, 10022, makes this verified statement (this “Verified Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) as follows:

1. Shearman & Sterling separately advises and otherwise represents various creditors and other parties in interest (collectively, the “Creditors”) who may hold claims against and/or interests in the debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned cases (the “Cases”).

2. The names and addresses of Creditors on whose behalf Shearman & Sterling has made appearances in these Cases are as set forth below:

- (i) Bank of America N.A. and its affiliates
One Bryant Park
New York, NY 10036
- (ii) Merrill Lynch International and its affiliates
Bank of America Tower
One Bryant Park
New York, NY 10036
- (iii) Nomura Global Financial Products, Inc.
2 World Financial Center
Building B
New York, NY 10281-1198
- (iv) Nomura International plc
Nomura House
1 St. Martin's-le Grand
London EC1A 4NP
- (v) Nomura Securities Co., Ltd.
1-9-1 Nihonbashi
Chuo-ku
Tokyo 103-8011
- (vi) IKB International S.A.
12, rue Erasme
L-1468 Luxembourg
- (vii) Ontario Teachers' Pension Plan Board
5650 Yonge Street
Suite 500
Toronto, Ontario
M2M 4H5
- (viii) BG Energy Merchants LLC
5555 Westheimer, Suite 1775
Houston, Texas 77056
- (ix) Fortis Investment Management Belgium N.V./S.A.
Avenue de l'Astronomie 14
1210 Brussels
Belgium
- (x) OZ Management LP and its affiliates
9 West 57th Street
39th Floor
New York, NY 10019

- (xi) Goldman Sachs & Co. Profit Sharing Master Trust (an affiliate of OZ Management LP)
9 West 57th Street
39th Floor
New York, NY 10019
- (xii) Banco Itau Europa Luxembourg S.A.
29, Avenue De La Porta Neuve
Luxembourg, L-2227
- (xiii) Tudor Investment Corporation and its affiliates
1275 King Street
Greenwich, CT 06831
- (xiv) Landesbank Baden-Württemberg
Am Hauptbahnhof 2
70173 Stuttgart
Germany

3. The nature and amount of the claims of the foregoing Creditors are as follows:

- (i) Bank of America N.A. and its affiliates (collectively, “Bank of America”) may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of Bank of America’s contractual, statutory and common law or other rights with or against the Debtors, and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors’ estates.
- (ii) Merrill Lynch International and its affiliates (collectively, “Merrill”) may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of Merrill’s contractual, statutory and common law or other rights with or against the Debtors, and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors’ estates.
- (iii) Nomura Global Financial Products, Inc. (“NGFP”) may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of NGFP’s contractual, statutory and common law or other rights with or against the Debtors and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors’ estates.
- (iv) Nomura International plc (“NIplc”) may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of NIplc’s contractual, statutory and common law or other rights with or against the Debtors and/or by operation of law. The specific nature and

amount of such claims are set forth in the proofs of claim filed against the Debtors' estates.

(v) Nomura Securities Co., Ltd. ("NSC") may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of NSC's contractual, statutory and common law or other rights with or against the Debtors and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors' estates.

(vi) IKB International S.A. ("IKB") may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of IKB's contractual, statutory and common law or other rights with or against the Debtors and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors' estates.

(vii) Ontario Teachers' Pension Plan Board ("OTPPB") may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of OTPPB's contractual, statutory and common law or other rights with or against the Debtors and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors' estates.

(viii) BG Energy Merchants LLC ("BGEM") may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of BGEM's contractual, statutory and common law or other rights with or against the Debtors and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors' estates.

(ix) Fortis Investment Management Belgium N.V./S.A. ("Fortis") may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of Fortis' contractual, statutory and common law or other rights with or against the Debtors and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors' estates.

(x) OZ Management LP ("OZ") may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of OZ's contractual, statutory and common law or other rights with or against the Debtors and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors' estates.

(xi) Goldman Sachs & Co. Profit Sharing Master Trust ("Goldman Trust") may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of Goldman Trust's contractual,

statutory and common law or other rights with or against the Debtors and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors' estates.

(xii) Banco Itau Europa Luxembourg S.A. ("Banco Itau") may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of Banco Itau's contractual, statutory and common law or other rights with or against the Debtors and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors' estates.

(xiii) Tudor Investment Corporation and its affiliates (collectively, "Tudor") may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of Tudor's contractual, statutory and common law or other rights with or against the Debtors and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors' estates.

(xiv) Landesbank Baden-Württemberg ("LBBW") may hold, whether directly or indirectly, claims against and/or interests in the Debtors arising out of LBBW's contractual, statutory and common law or other rights with or against the Debtors and/or by operation of law. The specific nature and amount of such claims are set forth in the proofs of claim filed against the Debtors' estates.

4. Each Creditor separately requested that Shearman & Sterling represent it in connection with the Cases. Shearman & Sterling holds no ownership interests in the claims of any of the Creditors described above.

5. If and to the extent Shearman & Sterling makes an appearance in these Cases on behalf of any of the other Creditors, Shearman & Sterling will supplement this Verified Statement in accordance with Bankruptcy Rule 2019.

6. Shearman & Sterling does not hold any claim against, or interest in, any of the Debtors.

Dated: New York, New York
April 10, 2015

SHEARMAN & STERLING LLP

By: /s/ Douglas P. Bartner
Douglas P. Bartner
Fredric Sosnick
599 Lexington Avenue
New York, New York 10022
Telephone: (212) 848-4000
Facsimile: (212) 848-8190

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS INC., et al. : **Chapter 11**

Debtors. : **(Jointly Administered)**

x

I, Douglas P. Bartner, a member of Shearman & Sterling LLP, a law firm maintaining its offices at 599 Lexington Avenue, New York, New York, 10022, declare under penalty of perjury that the attached statement under Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Rule 2019 Statement”) is true and correct to the best of my knowledge and that the filing of the Rule 2019 Statement on behalf of Shearman & Sterling LLP has been authorized.

Dated: New York, New York
April 10, 2015

SHEARMAN & STERLING LLP

By: /s/ Douglas P. Bartner
Douglas P. Bartner
Fredric Sosnick
599 Lexington Avenue
New York, New York 10022
Telephone: (212) 848-4000
Facsimile: (646) 848-8190